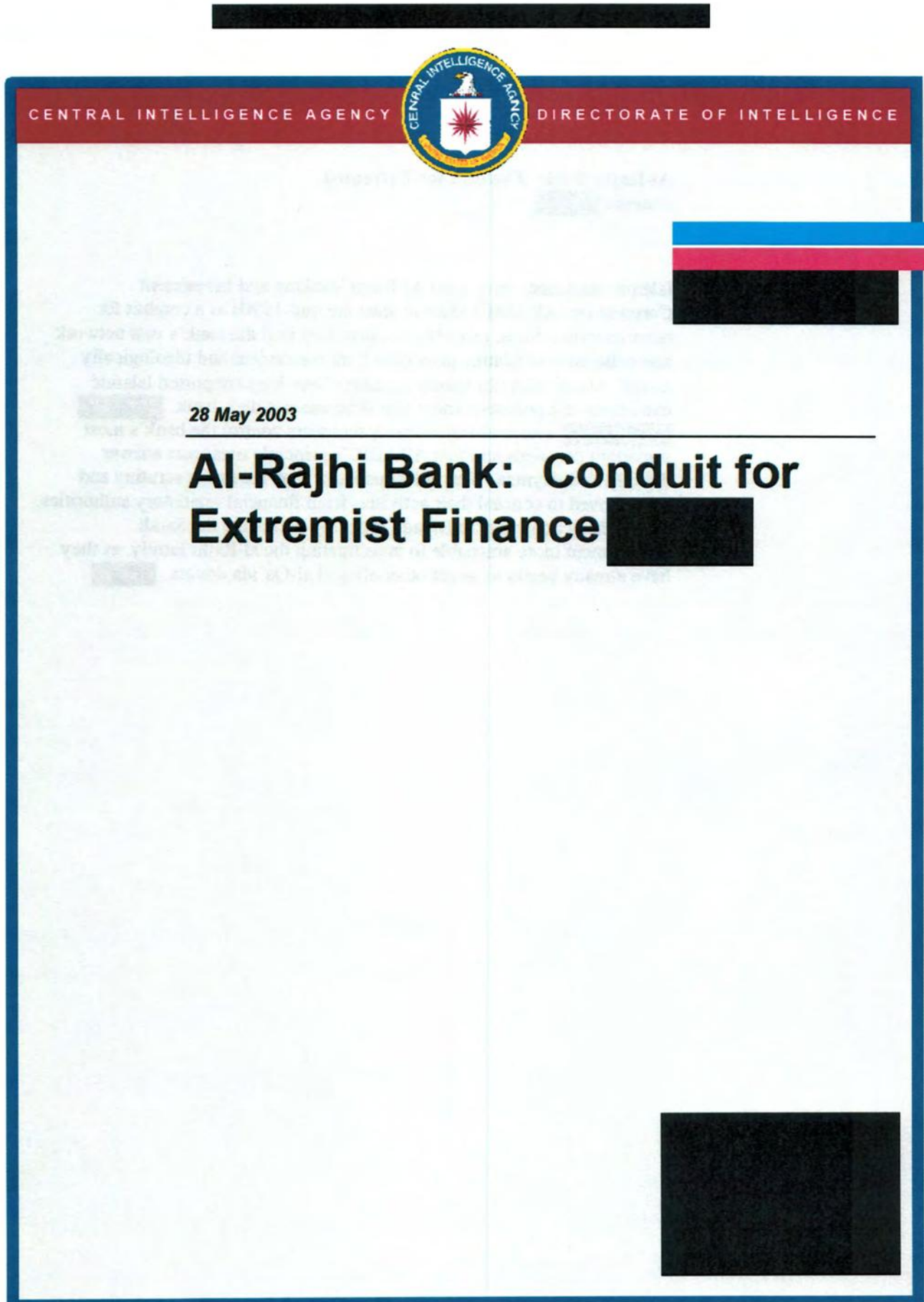


## Exhibit 10

Plaintiffs' Corrected Averment of Jurisdictional Facts and Evidence  
and/or Statement of Facts as to Defendant Al Rajhi Bank  
Pursuant to Rule 56.1



**Al-Rajhi Bank: Conduit for Extremist  
Finance** [REDACTED]

**Summary (U)**

Islamic extremists have used Al-Rajhi Banking and Investment Corporation (ARABIC) since at least the mid-1990s as a conduit for terrorist transactions, probably because they find the bank's vast network and adherence to Islamic principles both convenient and ideologically sound. Senior al-Rajhi family members have long supported Islamic extremists and probably know that terrorists use their bank. [REDACTED] [REDACTED] senior al-Rajhi family members control the bank's most important decisions and that ARABIC's principle managers answer directly to Sulayman. The al-Rajhis know they are under scrutiny and have moved to conceal their activities from financial regulatory authorities. The 12 May bombings in Riyadh probably will make the Saudi Government more amenable to investigating the al-Rajhi family, as they have already begun to target other alleged al-Qa'ida donors. [REDACTED]



## Al-Rajhi Bank: Conduit for Extremist Finance



*Islamic extremists have used Al-Rajhi Banking and Investment Corporation (ARABIC) since at least the mid-1990s as a conduit for terrorist transactions, probably because they find the bank's vast network and adherence to Islamic principles both convenient and ideologically sound.*

the al-Rajhis have a history of funding a broad array of Islamic causes, some of which have been associated with terrorists.

### Extremists' bank of choice.

since the mid-1990s several extremists ordered operatives in Afghanistan, Indonesia, Pakistan, Saudi Arabia, Turkey, and Yemen to use ARABIC.

**Extremists' accounts.** Extremists use ARABIC because its Islamic banking principles appeal to them and because it is one of the few banks with branches in outlying areas of Saudi Arabia, as well as good correspondent connections to remote locations abroad. Several al-Qa'ida-linked individuals and organizations have held bank accounts at Al-Rajhi.

- late 1990s, Bank al-Taqwa held a correspondent account at the Riyadh branch of Al-Rajhi Bank. The Department of Treasury listed Bank al-Taqwa's parent organization Al-Taqwa Management (a.k.a. Nada Management) as a foreign terrorist organization in November 2001.

### The al-Rajhi Family's Business Empire

The al-Rajhi family boasts 700 male members and an estimated net worth of \$20 billion.

ARABIC's 400 branches in Saudi Arabia make it the Kingdom's largest banking network. It has correspondents in 19 countries or jurisdictions, including JP Morgan Chase in New York. ARABIC had an outstanding loan to Enron at the time the energy company filed for bankruptcy, according to press reports, and Arthur Andersen was one of ARABIC's auditors.

- The family's business empire includes several Saudi companies, such as Al-Rajhi Development Company, Sanabel Trade and Agricultural Industry, Al-Rajhi Aluminum Company, Al-Rajhi Biotech Project (also known as CLONEBIOTECH), National Shipping Company of Saudi Arabia, Saudi Cement Company, Al-Rajhi Company for Industry and Trade, and Al-Fursan Travel and Tourism. Al-Rajhi Commercial Foreign Exchange and its subsidiaries, headed by Abdulrahman Abdulaziz al-Rajhi, are not considered part of the al-Rajhi empire because Abdulrahman Abdulaziz has fallen out of favor with the family.

- Muhammad Ghaleb Kalaje Zouyadi, arrested in 2002 for his role as the financial planner for the Barakat Yarkas' al-Qa'ida cell, used his Al-Rajhi account from 1993-1999.

This assessment was prepared by the DCI Counterterrorist Center's Office of Terrorism Analysis. Comments and queries are welcome and may be directed to



- Haji Wali Mohammed Trading Establishment maintained an Al-Rajhi account for business transactions as of August 2000. [REDACTED]. Afghan hawaladar Haji Wali Mohammed transferred money for Usama Bin Ladin. [REDACTED].
- [REDACTED] late 1990s Usama Bin Ladin may have used an account or accounts at Al-Rajhi Bank to pay al-Qa'ida operatives.
- In 2002, Syrian supporters of Islamic extremists sent donations to Majid 'Abdallah al-Turki's account at Al-Rajhi Bank. [REDACTED]

**Couriers.** Al-Rajhi has extensive money exchange operations, as well as representation in remote locations. In addition to traditional bank transactions, ARABIC has used couriers to move funds.

- In 2000, ARABIC couriers delivered money to the Indonesian insurgent group Kompak to fund weapons purchases and bomb-making activities. [REDACTED].
- ARABIC in 1999 helped obtain a visa for a courier who collected money in Saudi Arabia for the Egyptian Islamic Jihad (EIJ) Organization. [REDACTED]. Reporting does not indicate whether bank management was witting of the courier's EIJ affiliation. [REDACTED]

**Nongovernment organizations (NGOs).** [REDACTED] Gulf-based Islamic NGOs use ARABIC to transfer funds to their offices abroad some of which may be used to support terrorists. [REDACTED]:

- Saudi-based al-Haramain, which has come under close scrutiny by US and Saudi authorities for alleged terrorist ties, uses ARABIC and National Commercial Bank to fund its programs abroad.
- The International Islamic Relief Organization, a nongovernment organization with ties to al-Qa'ida, as of the late 1990s used Al-Rajhi to pay its employees. [REDACTED]

### Al-Rajhi Family Complicity and Control [REDACTED]

*Senior al-Rajhi family members have long supported Islamic extremists and probably know that terrorists use their bank.* Bank chairman Sulayman and several other al-Rajhis have given money to suspicious individuals and organizations worldwide. Moreover, Sulayman's tight control of ARABIC activities suggests he is witting that his bank is attractive to extremists.

- ARABIC Chairman Sulayman al-Rajhi and his brother Saleh al-Rajhi transferred \$4 million to Germany and Pakistan in December 1998, [REDACTED]. The brothers used a unique computer code to send funds at regular intervals to unspecified recipients. [REDACTED]

### Sulayman al-Rajhi: Parsimonious Patriarch [REDACTED]

Sulayman al-Rajhi, chairman of ARABIC, has amassed a personal fortune of at least \$12 billion largely through the activities of ARABIC but also from investments in industries ranging from travel to agriculture. [REDACTED]

Notoriously reclusive, Sulayman threatened to sue *Euromoney* magazine in the 1980s for publishing a picture of him on its cover underneath the title, "World's Richest Man." He is frugal, often staying with employees and using public transportation when he travels abroad. Sulayman devoutly practices Wahhabism, wearing a full-length beard and traditional Wahhabi garments. [REDACTED]

Sulayman blames the Saudi royal family for the accidental death of one of his grandchildren, who had been kidnapped and was killed during the police rescue attempt in 1994. [REDACTED]



Senior al-Rajhi family members, including family patriarch Sulayman al-Rajhi, have donated money to NGOs suspected of supporting terrorism.

- In the 1980s, the al-Rajhis established the SAAR Foundation—SAAR is an acronym for Sulayman Abdul Aziz al-Rajhi—to manage the family's charitable contributions. US law enforcement has long suspected the SAAR Foundation of funding HAMAS.
- [REDACTED] March 2003, Sulayman al-Rajhi defended his donations to the al-Haramain Islamic Foundation, which has come under scrutiny for its support to extremists.
- [REDACTED] 2001, Abdul Rahman Abdullah al-Rajhi, who as of April 2002 worked for the SAAR Foundation, sent [REDACTED]

[REDACTED] *senior al-Rajhi family members control the bank's most important decisions and that ARABIC's principle managers answer directly to Sulayman.* ARABIC historically granted branch managers substantial autonomy in consolidating statements, transferring funds, and detecting fraud, but [REDACTED] the bank is looking to remedy its poor internal reporting systems by centralizing control in the main office in Riyadh.

- Fahd 'Abdallah al-Rajhi, the head of ARABIC's International Business division, oversees all offshore placements but reports directly to Sulayman.
- Because the bank's headquarters has only minimal control over some of its branches, ARABIC is developing a new information technology platform for improved supervision. [REDACTED]

#### **Fighting Transparency and Oversight (U)**

*The al-Rajhis know they are under scrutiny and have moved to conceal their activities from financial regulatory authorities.*

- [REDACTED], Sulayman al-Rajhi in December 2002 directed ARABIC board members to explore financial instruments that would allow the bank's charitable contributions to avoid official Saudi scrutiny.

#### **Rift With Royals May Provide Leverage**

*Riyadh may be amenable to further investigating the al-Rajhi family, as [REDACTED] a contentious relationship between the al-Rajhis and the royal family.* Saudi officials have long shown a willingness to assert their authority over the al-Rajhi family and the 12 May bombings in Riyadh may spur the Saudi Government to take action against the bank and individual family members.

- An ARABIC official in December 2002 was concerned that a Saudi Arabian Monetary Agency (SAMA) investigation and press reports linking the bank to al-Qa'ida had already hurt ARABIC's international operations and would continue to harm the company, according to [REDACTED] press reporting.
- Former Saudi Finance Minister Muhammad 'Abd al-Khayl claimed in February 2003 that Saudi authorities forced him to relinquish his board position at Riyadh Bank because of his close ties to the al-Rajhi family.
- In 2002, the Saudi royals encouraged the al-Subayi family to establish an Islamic bank to rival ARABIC, saying the al-Rajhis were greedy and did not follow Islamic banking principles. [REDACTED]

The al-Rajhis have publicly criticized the royal family, calling them incompetent and corrupt. [REDACTED]. ARABIC claims that the royals carry unacceptable credit risks and, with the exception of a few real-estate deals, has refused to finance royal family projects. [REDACTED]



- The Saudi Government defaulted on all but \$4 million of a \$160 million loan when the first payment of \$53 million came due in early 1996 for the ARABIC-financed construction of 400 public schools in the early to mid-1990s.
- In 1996, Vice Minister of the Interior Prince Ahmad alleged al-Rajhi involvement in extremist attacks in Saudi Arabia and may have tried to extort money from Sulayman al-Rajhi. [REDACTED]

#### The al-Rajhi Brothers [REDACTED]

Saleh, Sulayman, Abdullah, and Mohammad—four sons of 'Abd al-Aziz al-Rajhi—established the Al-Rajhi Company for Currency Exchange and Commerce, ARABIC's precursor, in 1978, consolidating several smaller money exchanges opened by the brothers in the 1940s and '50s. In the late 1980s, the al-Rajhi brothers transformed the family exchange into Al-Rajhi Banking and Investment Corporation, a company whose success relies heavily on remittances and hajj revenues. [REDACTED]

**Sulayman** is the Chairman of ARABIC but also invests in a variety of domestic and foreign enterprises, which he limits to Sharia-acceptable investments such as product leasing (particularly aircraft) and commodity futures. Sulayman is the main shareholder in Al-Rajhi Aviation Limited, Arpent Investments Limited, SPC Limited, and Scientific Lease Investment Corporation. Within the Kingdom, Sulayman owns Al-Watania (poultry), Dajen (fast food restaurant chain), Al-Waha (packaged fruit juices), and Sanabel (dairy products). [REDACTED]

**Saleh**, the previous chairman of ARABIC, was rumored to have been diagnosed with cancer in the late 1990s and has entrusted the management of his vast real estate holdings to his son Yusuf Bin Saleh al-Rajhi. [REDACTED]

**Abdullah** continues to operate the Kingdom's largest building materials supply company, as well as a construction firm and separate concrete, plastics, marble, and brick factories. [REDACTED]

**Muhammad** serves on ARABIC's Board of Directors with his brothers but is not as active in the family businesses. [REDACTED]

#### US Links and Next Steps (U)

The al-Rajhi family's wealth and power have influenced Islamic communities around the world, including in the United States. The al-Rajhis' worldwide presence, paired with the Saudi royal family's willingness to investigate al-Rajhi misdeeds, presents several options for disrupting the family's aid to extremists both within and outside of Saudi Arabia.

- Listing, or threatening to list, ARABIC as a terrorist supporter under Executive Order 13224 or United Nations resolution 1267 could cripple the bank. ARABIC shares listed on the Saudi stock exchange dropped 4.6 percent almost immediately after the bank and family patriarch were named in a US lawsuit filed by the families of 11 September victims.
- The al-Rajhis' wide-ranging US connections—financial, charitable, and diplomatic—expose the family to domestic oversight, scrutiny, civil litigation, and criminal prosecution.
- The vast expanse of the al-Rajhi business empire places the family and its ventures under the jurisdiction of governments that may be willing to help investigate and stem al-Rajhi funding for extremists, even if the Saudis balk.
- Identifying and putting pressure on banks holding the family's offshore accounts could further disrupt the al-Rajhis' ability to send money to extremists. [REDACTED]

A successful effort against the al-Rajhis would encourage efforts against other donors, or at a minimum, would discourage private funding of al-Qa'ida. [REDACTED]